

EXHIBIT 1

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

MICHAEL SKIDMORE, as Trustee for the:

RANDY CRAIG WOLFE TRUST

Plaintiff

v.

LED ZEPPELIN

JAMES PATRICK PAGE

ROBERT ANTHONY PLANT

JOHN PAUL JONES

SUPER HYPE PUBLISHING, INC.

WARNER MUSIC GROUP CORP.

Parent of:

WARNER/CHAPPELL MUSIC, INC.

ATLANTIC RECORDING CORPORATION

RHINO ENTERTAINMENT COMPANY

Defendants

No.: *TBD*

CASE FILED:

MAY 31, 2014

CAUSES OF ACTION:

COPYRIGHT INFRINGEMENT

RIGHT OF ATTRIBUTION –
FALSIFICATION OF
ROCK N' ROLL HISTORY

JURY TRIAL DEMANDED

PLAINTIFF'S COMPLAINT
COPYRIGHT INFRINGEMENT AND RELATED CLAIMS REGARDING

STAIRWAY TO HEAVEN

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170. Defendants had direct access to “Taurus” by virtue of their close interaction with the band Spirit and Randy California, and the fact that they listened to Spirit play “Taurus” in concert, and likely purchased the album.

171. Access is also established because the similarities between “Taurus” and the iconic notes, melody, chord progression, structure, tempo, instrumentation, and feel of “Stairway to Heaven” are so strikingly similar that independent creation is precluded.

172. Substantial similarity between “Taurus” and “Stairway to Heaven” is established because, to a reasonable observer, the iconic notes, melody, chord progression, structure, tempo, instrumentation, and feel of “Stairway to Heaven” sound almost identical to Plaintiff’s protected expression in “Taurus.”

173. Because Defendants undeniably had access to “Taurus” and copied protected expression in “Taurus” to create “Stairway to Heaven,” they are liable for direct copyright infringement.

174. Without authorization or permission, Defendants continue to exploit “Taurus” as “Stairway to Heaven,” reaping tremendous financial rewards and other pecuniary benefits, to the detriment of Plaintiff.

175. Defendants use of “Taurus” in “Stairway to Heaven” was done with knowledge of the infringement and was otherwise willful.
